

Mr. David Everett
Damon Corporation, Plants 1, 2, 3 and 9
P.O. Box 2888
Elkhart, IN 46515-2888

Re: 039-12393
Second Administrative Amendment to
Part 70 039-6434-00407

Dear Mr. Everett:

Damon Corporation, Plants 1, 2, 3 and 9 was issued a permit on December 22, 1998 for motor homes and travel trailers manufacturing operation. A letter requesting an administrative change was received on June 16, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

1. The source requested to change the current coating used to paint motor-home chassis (chassis prep booth), to a coating that will increase VOC emissions by nine (9) tons per year. This increase in VOC emissions is less than 10 tons per year, therefore a minor source modification is not required. The change in coatings will not affect any descriptions in the current permit, therefore this change is noted.
2. Condition D.1.3, Volatile Organic Compounds listed on page 27 of 44, is removed from the permit because this condition was erroneously left in the permit. The condition is applicable if the equipment listed in Section D.1 took a limit on VOC emissions to less than twenty-five (25) tons per year in order to avoid 326 IAC 8-1-6 (New Facilities; General Reduction Requirement). Since the equipment listed in Section D.1 is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), 326 IAC 8-1-6 is not applicable and Condition D.1.3 is not required. The following conditions are re-numbered accordingly.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, at (800) 451-6027, press 0 and ask for Nysa L. James or extension (3-6875), or dial (317) 233-6875.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

Damon Corporation, Plants 1,2,3 and 9
52570 Paul Dr.
Elkhart, IN 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6434-00407	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 22, 1998
First Administrative Amendment AAT 039-10524-00407	Pages Affected: 2 through 44 of 44
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: January 26, 1999
Second Administrative Amendment AAT 039-12393-00407	Pages Affected: 27-29
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) coating booth, identified as Chassis Prep, coating metal vehicle chassis, method of application is air assisted airless, using dry filters for overspray control, and exhausting to stack E4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to sheets of metal shall be limited to:

Coatings	Limit (pounds of VOC/gallon of coating less water delivered to the applicator)
Clear Coat	4.3
Extreme Performance Coat	3.5
All Other Coat	3.0

- (b) If more than one (1) emission limitation in section D.1.1 (a) applies to a specific coating then the least stringent emission limitation shall be applied.
- (c) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.3 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential VOC emissions to 25 tons per year per day from the process noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance Determination Requirements

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Monitoring

- (a) Weekly inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack E4 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content the coatings used, if this method is used to comply with 326 IAC 8-2-9, for each day.

- (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.